REMARKS

INTRODUCTION

In accordance with the foregoing, claims 36-41 have been cancelled. Claims 42 and 43 have been added. Claims 42 and 43 are pending and under consideration.

CLAIM REJECTIONS

Claims 36, 38, 39 and 41 were rejected under 35 USC 103(a) as being unpatentable over Tsukamoto et al. (US 2002/0048033) (hereinafter "Tsukamoto") in view of the Applicants Admitted Prior Art (hereinafter "AAPA").

Claims 37 and 40 were rejected under 35 USC 103(a) as being unpatentable over Tsukamoto in view of the AAPA and further in view of Kanno (US 6,252,609) (hereinafter "Kanno").

Claims 36-41 have been cancelled.

NEW CLAIMS

New claims 42 and 43 have been added to present an alternate recitation of the present invention. Support for these new claims may be found in Figures 2 and 3 of the present application.

New claim 42 recites an image forming apparatus comprising a printing unit to execute printing functions; a processor to control functions executed by the image forming apparatus, wherein the processor executes a plurality of programs in response to powering on of the image forming apparatus; a memory; an operation panel unit; a first interface connected with an external apparatus to receive print data; and a second interface, separate from the first interface, to removably receive a portable storage unit providing an additional function related to the image forming apparatus that was not previously supported by the image forming apparatus, wherein the processor determines whether the portable storage unit is installed in the second interface, and determines whether an execution file is stored in the portable storage unit, wherein if it is determined that the portable storage unit is installed in the second interface and the execution file is stored in the portable storage unit, the processor displays a menu via the operation panel unit to enable a user to select an execution of the additional function related to the image forming apparatus, wherein when the user selects the additional function via the operation panel unit, a plug-in program corresponding to the additional function selected by the user stored in the portable storage unit is executed.

New claim 43 recites an image forming apparatus comprising a printing unit to execute printing functions; a processor to control functions executed by the image forming apparatus, wherein the processor executes a plurality of programs in response to powering on of the image forming apparatus; a memory; an operation panel unit; a first interface connected with an external apparatus to receive print data; and a second interface, separate from the first interface, to removably receive a portable storage unit providing an additional function related to the image forming apparatus that was not previously supported by the image forming apparatus, wherein the processor determines whether the portable storage unit is installed in the second interface, and determines whether an execution file is stored in the portable storage unit, wherein if it is determined that the portable storage unit is installed in the second interface and the execution file is stored in the portable storage unit, the processor displays a menu via the operation panel unit to enable a user to select an execution of the additional function related to the image forming apparatus, wherein the additional function selectable by the user corresponds to one of the programs executed by the processor in response to the powering on of the image forming apparatus, wherein when the user selects the additional function via the operation panel unit, a plug-in program corresponding to the additional function selected by the user stored in the portable storage unit is executed, wherein the plug-in program corresponding to the additional function is executed in response to the receiving of a user request via the operation panel unit, wherein the plug-in program does not have an independent interface and can be used by being connected with the corresponding one of the executed programs and provides additional function to the one of the executed programs that was not previously supported by the one of the executed programs.

It is respectfully submitted that claims 42 and 43 patentably distinguish over the relied upon prior art. In particular, new claim 42 recites that if it is determined that the portable storage unit is installed in the second interface and the execution file is stored in the portable storage unit, the processor displays a menu via the operation panel unit to enable a user to select an execution of the additional function related to the image forming apparatus; wherein when the user selects the additional function via the operation panel unit, a plug-in program corresponding to the additional function selected by the user stored in the portable storage unit is executed. This feature is difficult to derive from the relied upon references.

Similarly, it is also respectfully submitted that, in particular, new claim 43 recites that if it is determined that the portable storage unit is installed in the second interface and the execution file is stored in the portable storage unit, the processor displays a menu via the operation panel unit to enable a user to select an execution of the additional function related to the image

forming apparatus; wherein the additional function selectable by the user corresponds to one of the programs executed by the processor in response to the powering on of the image forming apparatus; wherein when the user selects the additional function via the operation panel unit, a plug-in program corresponding to the additional function selected by the user stored in the portable storage unit is executed; wherein the plug-in program corresponding to the additional function is executed in response to the receiving of a user request via the operation panel unit; wherein the plug-in program does not have an independent interface and can be used by being connected with the corresponding one of the executed programs and provides additional function to the one of the executed programs that was not previously supported by the one of the executed programs. These features are difficult to derive from the relied upon references.

As shown above, the plug in program of claims 42 and 43 adds additional functions that are not supported by the main program, and does not change an old feature to a new feature as the Examiner has argued in previous rejections.

Further, the Examiner has previously noted that in Tsukamoto, since the program in the ROM instructs the CPU to utilize a program in the interface cards to perform a feature on the apparatus, the implementation of the program by the CPU is considered analogous to the connection between a main program and a file for executing a function. In addition, paragraph [0117] of Tsukamoto discusses: "...if a storage enabled card, such as a memory card or a hard disk card, set in an empty card slot 122(or 121) stores a program for controlling the modem card with the NCU and data."

Accordingly, referring to the above description, Tsukamoto discloses that the program stored in the program IC card stores a program necessary for CPU to operate a new modem card, that is, an interface card. The interface card is a hardware apparatus which replaces a conventional modem 118. Therefore, the program of Tsukamoto is distinct from the plug in program of claims 42 and 43.

Specifically, the plug in program of claims 42 and 43 provides additional functions to the main program of an image forming apparatus, and is not a program for replacing a conventional function or operating certain hardware.

It is further respectfully noted that the feature of claims 42 and 43 where if it is determined that the portable storage unit is installed in the second interface and the execution file is stored in the portable storage unit, the processor displays a menu via the operation panel unit to enable a user to select an execution of the additional function related to the image forming apparatus is also not discussed in the relied upon references. Previous Office Actions

have noted that the primary reference Tsukamoto does not discuss displaying, via an operation panel unit of the image processing apparatus, messages. Instead previous Office Actions have relied on Kanno to show this feature, and specifically relied on 10:14-10:36 of Kanno.

In Kanno, a copier has a card holder 401 into which an IC card 402 is inserted, and an EEPROM 501 for storing data read in from the IC card 402. The IC card 402, on which PGA internal data has been stored, is inserted into the card holder 401 so that the stored content is read by the CPU 112, the read content (PGA internal data) is written to the EEPROM 501, and the PGA internal data is then downloaded to the corresponding PGA that has been selected. In Kanno, when the IC card 402 storing functions desired by the user is inserted into the card holder 401, a list of the functions that have been stored on the IC card are displayed on the display screen of the control panel 114. The user selects the necessary functions from this list. Data conforming to the tendency of function use by a specific user can be stored on the IC collectively beforehand in the manner of an "Office Function Set" or "Designer Function Set", etc. Kanno, 10:5-10:24 and Figures 6 and 7.

As shown above, although Kanno discusses listing functions that have been stored on the IC card on the display screen of the control panel 114, Kanno does not discuss the feature of claims 42 and 43 of determining that if the portable storage unit is installed in the second interface **and** the execution file is stored in the portable storage unit, then the processor displays a menu via the operation panel unit to enable a user to select an execution of the additional function related to the image forming apparatus. Instead, Kanno only discusses displaying a list of the functions that have been stored on the IC card, regardless of whether these functions can actually be executed. This technical aspect of claims 42 and 43 solve the problem in the conventional art where communication with an external apparatus having a new interface that is not installed in the printer cannot be performed.

No new matter has been added. Entry and consideration are respectfully requested.

CONCLUSION

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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Date: December 1, 2009

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